

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re application : Jose Villena et al.  
Serial No. : 09/456,166  
Filed : December 7, 1999  
For : Non-Blocking Expandable Call Center  
Architecture  
Attorney's Docket : CELLIT-003XX  
Examiner : Steven Blount  
Group Art Unit : 2742

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RESPONSE TO OFFICE ACTION

Mail Stop Amendments  
Commissioner of Patents  
PO Box 1450  
Alexandria, VA, 22313-1450

Sir or Madam:

In response to the Office Action dated June 29, 2006, please  
amend the above-identified Patent Application as follows:

In the Claims:

Cancel claims 1-27

28. (Previously Presented) A switching apparatus for a contact center having:

- a local area network;
- a public network; and
- a first switching apparatus being configured to connect to said public network and being configured to communicate over said local area network with a second switching apparatus wherein the first switching apparatus has a trunk interface for communicating to the public network with a number of trunk channels equal to T; an agent station interface with a number of channels to couple to agent stations equal to S; a processing resources interface with a number of channels to couple to processing resources equal to R; and a switching device interface with a number of channels to couple to the second switching device equal to B, the improvement comprising said first switching apparatus having a number of channels reserved to couple to said second switching device, wherein B (number of switching device channels) is greater than or equal to T (number of trunk channels) plus S (number of agent station channels).

29. (Previously Presented) The contact center of claim 28 wherein public network interface includes Public Switch Telephone Network (PSTN).

30. (Previously Presented) The contact center of claim 28 wherein public network interface includes internet telephony.

31. (Previously Presented) The contact center of claim 28 wherein processing resources interface includes conference, recording, and playback resources.

32. (Previously Presented) The contact center of claim 28 wherein said first switching apparatus includes time division multiplexing for providing interface channels.

33. (Previously Presented) The contact center of claim 32 wherein a number of channels provided allows said contact center to be linearly expandable and the switching channels in the

second switching apparatus are all utilized for call switching rather than interfacing with other switching apparatus.

34. (Previously Presented) The contact center of claim 32 wherein a number of channels provided equals  $B$  (number of switching device channels) plus  $T$  (number of trunk channels) plus  $S$  (number of agent station channels) plus  $R$  (number of processing resources channels).

35. (Previously Presented) The contact center of claim 32 wherein  $B$  (number of switching device channels),  $T$  (number of trunk channels),  $S$  (number of agent station channels), and  $R$  (number of processing resources channels) are set based on the number of interface channels provided such that said contact center to be linearly expandable and the switching channels in the second switching apparatus are all utilized for call switching rather than interfacing with other switching apparatus.

36. (Previously Presented) The contact center of claim 28 wherein the agent station channels are connected to said first switching apparatuses through a legacy PBX.

37. (Previously Presented) The contact center of claim 28 wherein contact center further comprises a backup switching apparatus and a means for detecting when said first switching apparatus is faulty and activating said backup switching apparatus for service.

38. (Previously Presented) The contact center of claim 28 wherein contact center further comprises a backup switching apparatus and a means for detecting when one of said first switching apparatus and said second switching apparatus is faulty and activating said backup switching apparatus for service, said backup apparatus being configured to service one of said first switching apparatus and said second switching apparatus which is detected as failing.

**REMARKS**

This is a complete response to the outstanding Office Action mailed June 29, 2006. Upon entry of the enclosed claim amendments, claims 28-38 remain pending in the present application.

I. Response to Claim Rejections Based on Obviousness

In the Office Action, claims 28-36 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over (Applicant's Admitted Prior Art, hereinafter referred to as "AAPA") in view of Rackin (U.S. Patent 4,674,083, hereinafter referred to as "Rackin"). Applicant respectfully traverses this rejection.

The Office Action selectively takes portions of Rackin to attempt to assemble an obviousness argument. The reference Rackin appears to be further off-base than previous references cited in prior office actions. Rackin discloses a time division multiplexed switch with time slots that may be concatenated or subdivided on a port-by-port basis without any modification to the switch. Rackin does not disclose a switching apparatus being connected to a public network and communicating over a local area network with a second switching apparatus. Rackin does not

specifically disclose being connected to another switch. Rackin's disclosure of the issue of blocking not being a problem when the number of receiving ports does not exceed the number of available transmission path, relates to the switch itself not a communication path with another switch. Rackin is referring to expansion and configuration of the switch itself (i.e. reconfiguring the switch and modifying the number receiving/transmission ports).

Applicant claims a switching device interface with a number of channels to couple to the second switching device equal to B, wherein B (number of switching device channels) is greater than or equal to T (number of trunk channels) plus S (number of agent station channels). Rackin does not disclose or suggest setting the number channels used to interface with another switching device. Not only does the teaching of Rackin not relate to Applicant's claimed invention, the Office Action also does not supply a disclosure of providing channels over LAN connecting the two switching devices or a motivation for limiting the channels over the LAN connecting the two switching devices. Therefore, for at least this reason claim 28 is allowable.

The Applicant also respectfully submits that patent US

4,228,535 to Workman et al. does not cure the above deficiencies. Therefore, claim 28 should be allowed for at least the above reasons. The Applicant also respectfully submits that since claims 29-38 depend on independent claim 28, claims 29-38 contain all limitations of independent claim 28. Since independent claim 28 should be allowed, as argued herein, pending dependent claims 29-38 should be allowed as a matter of law for at least this reason. In re Fine, 5 U.S.P.Q.2d 1596, 1608 (Fed. Cir. 1988).

#### CONCLUSION

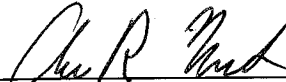
In light of the foregoing comments and for at least the reasons set forth above, Applicant respectfully submits that all objections have been traversed, rendered moot and/or accommodated, and that presently pending claims 28-38 are in condition for allowance. Applicant has responded to all of the Examiner's requests. Favorable reconsideration and allowance of the present application and the presently pending claims are hereby courteously requested. The examiner is invited to telephone the undersigned, Applicant's attorney of record, to facilitate advancement of the present application.



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Respectfully submitted,

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Date: 9-29-06